UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOHN DAGENHART and   : CHAPTER 13
       ANGELLA DAGENHART   :
         Debtor(s)   :
                               :

CHARLES J. DEHART, III   :
STANDING CHAPTER 13 TRUSTEE   :
         Movant   :
                               :

       vs.   :
                               :

JOHN DAGENHART and   :
ANGELLA DAGENHART   :
       Respondent(s)   : CASE NO.   1-19-bk-02237

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

      AND NOW, this   16th   day of September, 2019, comes Charles J. DeHart, III,
Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)'
plan for the following reason(s):

      1.   Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not
submitted all or such portion of the disposable income to the Trustee as required.   More
specifically,

      Trustee alleges and avers that debtor(s)' disposable income is greater than that
which is committed to the plan based upon the Means Test calculation and specifically disputes the
following amounts:

      a.   Plan payment calculation sum of Lines 34, 35, 36 45.
      b.   Verify Lines 10 (Heating/cooling units – Estimates not attached)
      c.   Verify Line 15 (Public transportation expense)

      WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and
therefore Trustee prays that this Honorable Court will:

      a.   Deny confirmation of debtor(s) plan.
      b.   Dismiss or convert debtor(s) case.
      c.   Provide such other relief as is equitable and just.

                                Respectfully submitted:

                                Charles J. DeHart, III
                                Standing Chapter 13 Trustee
                                8125 Adams Drive, Suite A
                                Hummelstown, PA 17036
                                (717) 566-6097

            BY: /s/James K. Jones
                   Attorney for Trustee

<u>CERTIFICATE OF SERVICE</u>

        AND NOW, this   16th   day of September, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Aaron John Neuharth, Esquire
P.O. Box 359
Chambersburg, PA   17201

                                        /s/Deborah A. Behney
                                        Office of Charles J. DeHart, III
                                        Standing Chapter 13 Trustee